

NRG Delta LLC Pittsburg Generating Station 696 West 10th Street P.O. Box 192 Pittsburg, CA 94565

September 14, 2017

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street Suite 600 San Francisco, CA 94105 Attn: Title V Reports

Semi-Annual Title V Compliance Monitoring Report and Compliance Certification Statement for NRG Delta LLC, Pittsburg Generating Station (Facility #A0012) for the Period of March 1, 2017 through August 1, 2017

Please find enclosed the Semi-Annual Title V Compliance Monitoring Report and Compliance Certification Statement for NRG Delta LLC, Pittsburg Generating Station (Facility #A0012) covering the period of March 1, 2017 through August 1, 2017. Please note that the Title V permit for Facility #A0012 has expired, effective August 1, 2017. Therefore, this will be the final Semi-Annual Title V Compliance Monitoring Report and Compliance Certification Statement for the facility.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding the content of this report, please contact Mr. Tom Bertolini at (925) 427-3503.

Sincerely,

Lawrence Penn Plant Manager

Pittsburg Generating Station

Attachments

COMPLIANCE CERTIFICATION

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Compliance Monitoring Report are true, accurate, and complete.

Certification Period:	March 1, 2017 – August 1, 2017
Facility:	Facility #A0012 NRG Delta LLC Pittsburg Generating Station 696 West 10 th Street Pittsburg, CA 94565
Name of Responsible Official:	Lawrence Penn
Signature:	
Date:	9/14/2017

Pittsburg Generating Station, Facility No. A0012 Semi-Annual Title V Compliance Monitoring Report Summary of Instances of Non-Compliance March 1, 2017 - August 1, 2017

	Corrective Action Taken		
	Cause of Deviation		
Z	Jo	Dev	
		Time	
Deviation Period	End	Time Date	
Deviatio	ţ	Time	
	Start	Date	
	Deviation Permitted Requirement		
	Deviation Permitted	3	
	Perm	5	

No deviations occurred for the reporting period.

Table VII-A

$\ \, \textbf{Applicable Limits \& Compliance Monitoring Requirements} \\$

S-5, Boiler No. 5, Power Generation S-6, Boiler No. 6, Power Generation S-7, Boiler No. 7, Power Generation March 1, 2017 - August 1, 2017

			Future		Monitoring	Monitoring		Com	oliance
Type of Limit	Citation of Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
Opacity	BAAQMD Regulation 6 6-1-301	Y		Ringelmann No. 1 during any 3 min/hr	None	N	N/A	Х	
	SIP Regulation 6-301	Y		> Ringelmann No. I for no more than 3 min/hr	None	N	N/A	Х	
	BAAQMD Regulation 6 6-1-304	Y		Ringelmann No. 2 during tube cleaning	None	N	N/A	Х	
	SIP Regulation 6-304	Y		> Ringelmann No. 2 during tube cleaning for no more than 3 min/hr	None	N	N/A	х	
Opacity	40 CFR 75	Y		None	40 CFR 75.14(c)	N		Х	
FP	BAAQMD Regulation 6-1-310.3	Y		0.15 grains/dscf @ 6% O ₂	None	N	N/A	. X	
FP	SIP Regulation 6-310.3	Y		0.15 grains/dscf @ 6% O ₂	None	N	N/A	Х	
SO ₂	BAAQMD Regulation 9-1-301	Y		Ground Level Concentration of 0.5 ppm for 3 minutes or 0.25 ppm for 60 minutes or 0.05 ppm for 24 hours	None	N	N/A	Х	
SO2	BAAQMD Regulation 9-1-302	Y		300 ppmvd	None	N	N/A	х	
SO2	40 CFR 75	Y		None	40 CFR 75	P/Q	calculations	Х	
NOx	BAAQMD Regulation 9-3-301	N		175 ppmv @ 3% O ₂ (dry basis) for natural gas firing	BAAQMD Regulation 1-520.1 9-11-501, 503	С	CEMS	Х	

Table VII-A

Applicable Limits & Compliance Monitoring Requirements

S-5, Boiler No. 5, Power Generation S-6, Boiler No. 6, Power Generation S-7, Boiler No. 7, Power Generation March 1, 2017 - August 1, 2017

			Future		Monitoring	Monitoring		Comp	pliance
Type of	Citation of	FE	Effective		Requirement	Frequency	Monitoring	Yes	No
Limit	Limit	Y/N	Date	Limit	Citation	(P/C/N)	Туре		
NOx	BAAQMD	Y		175 ppmv	BAAQMD	С	CEMS	X	
	Regulation	<u> </u>		@ 3% O ₂ (dry basis)	Regulation				
	9-11-302.1.1			for natural gas firing	1-520.1				
				based on a clock hour	9-11-501, 503				
				average					
NOx	BAAQMD	Y		0.28 lbs/MMBTU	BAAQMD	С	CEMS	X	
	Regulation			system-wide average	Regulation				
	9-11-308			over previous 30	1-520.1				
				days	9-11-501, 503				
NOx	BAAQMD	N		0.018 lbs/MMBTU	BAAQMD	С	CEMS	X	
	Regulation			system-wide average	Regulation				
	9-11-309.1			on a clock hour	1-520.1				
				average	9-11-501, 503				
NOx	40 CFR 75	Y		None	40 CFR 75	С	CEMS	X	
СО	BAAQMD	Y		400 ppmv	BAAQMD	С	CEMS	х	l
	Regulation			@ 3% O ₂ (dry basis)	Regulation				
	9-11-310.1			during steady state	9-11-501, 503				
				compliance tests					
СО	BAAQMD	Y		1000 ppmv	BAAQMD	С	CEMS	Х	
	Regulation			@ 3% O ₂ (dry basis)	Regulation				
	9-11-310.2			during normal	9-11-501, 503				
				operation on a clock					
		1		hour average					İ
Ammonia	BAAQMD	Y		10 ppmv	BAAQMD	P/Q	Quarterly	X	
	Regulation			@ 3% O ₂ (dry basis)	Regulation		tests	}	1
	9-11-311			based on rolling 60	9-11-402]
				minute average upon					
L				SCR			<u> </u>		

Table VII-B

Applicable Limits & Compliance Monitoring Requirements S-36 EMERGENCY DIESEL GENERATOR S-49, S-51 AND S-53 DIESEL FIRE PUMPS March 1, 2017 - August 1, 2017

			Future		Monitoring	Monitoring		Comp	oliance
Type of Limit	Citation of Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
FP	BAAQMD Regulation 6-1-303.1	N		Ringelmann No. 2.0 for no more than 3 min/hr	BAAQMD Regulation 6-1-401	P/W	Visible Inspection during reliability testing	X	
FP	SIP Regulation 6-303.1	Y		> Ringelmann No. 2 for no more than 3 min/hr	BAAQMD Regulation 6-1-401	P/W	Visible Inspection during reliability testing	Х	
FP	BAAQMD Regulation 6-1-310.1	N		0.15 gr/dscf	None	N	None	Х	
FP	SIP Regulation 6-310.1	Y		0.15 gr/dscf	None	N	N/A	X	
SO ₂	BAAQMD Regulation 9-1-301	Y		Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and <0.05 ppm for 24 hours	None	N	None	Х	
SO ₂	BAAQMD Regulation 9-1-304	Y		Fuel Sulfur Limit 0.5%	None	P/M	None	Х	
Operating Time	BAAQMD Regulation 9-8-330.2 Condition #22820, Part 1	N	Until 1/1/2012	20 hours per year	BAAQMD Condition # 22820, Part 4	P/D	Records	Х	
Operating Time	BAAQMD Regulation 9-8-330.2 Condition #22834	N	Until 1/1/2012	34 hours per year	BAAQMD Condition # 22834 Part 4	P/D	Records	х	
Operating Time	BAAQMD Regulation 9-8-330.3	N	Effective 1/1/2012	20 hours per year	BAAQMD Regulation 9-8-502, 530	P/D	Records	Х	
Operating Time	BAAQMD Regulation 9-8-330.3	N	Effective 1/1/2012	34 hours per year	BAAQMD Regulation 9- 8-502, 530	P/D	Records	Х	

Table VII-C Applicable Limits & Compliance Monitoring Requirements S-58, Service Station March 1, 2017 - August 1, 2017

	Citation of		Future		Monitoring	Monitoring		Comp	liance
Type of Limit	Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
VOC	BAAQMD Regulation 8-7-301.10	Y		Installed & modified only if the system is 98% controlled or highest vapor recovery rate specified by CARB		Event	CARB Re- Certification	Х	
VOC	BAAQMD Regulation 8-7-301.6	Y		Leak Free & Vapor Tight on Phase I equipment	BAAQMD Regulation 8-7-301.13	P/A	Source Test	Х	
VOC	BAAQMD Regulation 8-7-302.8	Y		Minimum liquid removal rate of 5 ml/gal		N		Х	
VOC	BAAQMD Regulation 8-7-302.10	Y		Connector between riser and dispenser < 1 inch diameter		N	Visual Check	X	
VOC	BAAQMD Regulation 8-7-302.12	Y		Liquid retain in nozzle < 100 ml/1000gal		N		X	
VOC	BAAQMD Regulation 8-7-302.13	Y	1	Spitting from nozzle < 1 ml/nozzle		N		Х	
VOC	BAAQMD Regulation 8-7-302.14.2	Y		Dynamic back pressure < 0.15, 0.45, 0.95" water when measure nitrogen flow rate of 20, 60 and 100 CFH	BAAQMD Regulation 8-7-302.14	P/A	Source Test	Х	
Fuel Throughput	BAAQMD Permit Condition #6583	N		1.7 million gallons in any 12 consecutive months	BAAQMD Regulation 8-7-503	P/M	Records	Х	

Table VII-D

Applicable Limits & Compliance Monitoring Requirements S-62, Oil-Water Separator

S-63, Dissolved Air Flotation Unit (DAF) March 1, 2017 – August 1, 2017

	Citation of		Future		Monitoring	Monitoring		Comp	liance
Type of Limit	Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
VOC	BAAQMD	Y		1.0 ppm critical organic	BAAQMD	Ρ/	Sampling	X	
	Regulation8			compounds	Regulation	Semi-annual			
	-8-112				8-8-502				
VOC	SIP	Y		1.0 ppm critical organic	SIP	Ρ/	Sampling	X	
	Regulation			compounds	Regulation	Semi-annual			
	8-8-112				8-8-502				
Wastewater	BAAQMD	N		50 million gallons in any	BAAQMD	С	Flow Meter	X	
Throughput	Permit			12 consecutive months	Permit				
	Condition				Condition				
	#10431,				#10431,				
	#Part 1				Part #3				
Stormwater	BAAQMD	N		90.72 million gallons in	BAAQMD	С	Flow Meter	X	
Throughput	Permit			any 12 consecutive	Permit				
	Condition			months	Condition				
	#10431, Part				#10431,				
	#2				Part #3				

Table VII-E Applicable Limits & Compliance Monitoring Requirements S-70, Paint Spray Operation - Maintenance March 1, 2017 - August 1, 2017

	Citation of		Future		Monitoring	Monitoring		Comp	liance
Type of Limit	Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
VOC	BAAQMD	N		VOC Contain Limits	BAAQMD	P/E	Labeling	X	
	Regulation			Table 1	Regulation				
	8-3-301				8-3-401.3				
VOC	BAAQMD	N	1/1/2011	VOC Contain Limits	BAAQMD	P/E	Labeling	X	
	Regulation			Table 2	Regulation				1
	8-3-301				8-3-401.3				
VOC	SIP	Y		content of coating less	SIP	P/E	Labeling	X	
	Regulation	ļ		than 250 grams per liter	Regulation				
	8-3-301				8-3-401.3				
voc	BAAQMD	N		content of coating less	BAAQMD	P/E	Labeling	X	
	Regulation			than 250 grams per liter	Regulation				
	8-3-302.14				8-3-401.3		'		
VOC	BAAQMD	N	1/1/2011	content of coatings <	BAAQMD	P/E	Labeling	X	
	Regulation			specified VOC content	Regulation	<u> </u>			1
	8-3-302.2				8-3-401.3				
VOC	SIP	Y		content of coatings <	SIP	P/E	Labeling	Х	
	Regulation			specified VOC content	Regulation				
	8-3-302				8-3-401.3			:	
VOC	BAAQMD	Y		content of coatings <	Regulation	P/E	Labeling	Х	
	Regulation		ļ	specified VOC content	8-3-403				
	8-3-304								
VOC	BAAQMD	Y		content of air dried	BAAQMD	P/E	Records	X	
	Regulation			coating < 2.8 lb/gal	Regulation				
	8-19-302				8-19-501				<u> </u>
VOC	BAAQMD	Y		content of coatings <	BAAQMD	P/E	Records	X	
	Regulation			specified VOC content	Regulation				
	8-19-312				8-19-501				
	BAAQMD	Y		6500 gallons	BAAQMD	P/E	Records	X	
Coating	Permit	ŀ		in any 12 consecutive	Permit		,		
usage	Condition			months	Condition				
	#8425,				#8425, Part				
	Part #1				#3				
Cleanup	BAAQMD	Y		500 gallons	BAAQMD	P/E	Records	х	
Solvent	Permit			in any 12 consecutive	Permit				
usage	Condition		1	months	Condition				
	#8425,				#8425, Part				
	Part #2	L			#3				

Table VII-F Applicable Limits & Compliance Monitoring Requirements S-71, Solvent Wipe Cleaning Operation March 1, 2017 - August 1, 2017

]	1 1	Monitoring		Compliance		
Type of Limit	Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
VOC		N			BAAQMD 8-16-501	P/M	Records	X	
		Y			SIP 8-16-501	P/M	Records	X	
VOC	SIP 8-16-304	Y		Trichloroethylene usage ≤ 3.2 gallons per day	8-16-501	P/E	Records	X	
Solvent Usage	BAAQMD Permit Condition #8427 part #1	Y		150 gallons in any 12 consecutive months	BAAQMD Permit Condition 8427 part 3	P/E	Records	Х	

Table VII-G Applicable Limits & Compliance Monitoring Requirements S-72, Sand Blasting Facility March 1, 2017 -August 1, 2017

	Citation of		Future		Monitoring	Monitoring		Comp	liance
Type of Limit	Limit	FE Y/N	Effective	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring	Yes	No
	DAAOMD		Date			(P/C/N)	Type Differential	X	<u> </u>
Opacity	BAAQMD	Y		Ringelmann 1 for 3	BAAQMD		!	Λ	
	Regulation			minutes/hr	Condition		Pressure		
	6-1-301 And				13345, Part 3		Failure		
	BAAQMD]			Warning		
	Permit						System		
	Condition	1					1		
	13445 part 5	ļ							
Opacity	SIP	Y	i I	Ringelmann 1 for 3		С	Differential	X	
	Regulation			minutes/hr		l 	Pressure		
	6-301 And	ļ	ļ		i,		Failure		
	1		Ì				Warning		ļ
							System		
FP	BAAQMD	Y		No emissions from source	BAAQMD	С	Differential	X	
	Regulation		ļ	> 0.15 grains per dscf of	Condition		Pressure		
1	6-1-310	1		gas volume	13345, Part 3		Failure		
							Warning		
		ļ					System		
FP	SIP	Y		No emissions from source		С	Differential	Х	
	Regulation		Ĺ	> 0.15 grains per dscf of	h		Pressure		
	6-310			gas volume			Failure		}
					ŀ		Warning		
							System		
Abrasive	BAAQMD	Y		384 tons in any 12	BAAQMD	P/E	Records	X	
Usage	Permit	•	1	consecutive months	Permit	.,5	11000100		
(Annual)	Condition			Consecutive months	Condition		Ì		1
(Allitual)	13445	i			13445 part 4)		1
	ll .		1		13443 part 4				
Abrasive	part l BAAQMD	Y		16 ton/day	BAAQMD	P/E	Records	X	
	1	'		10 ton/day	Permit	1/E	Recolus	^	
Usage	Permit				Condition				
(Daily)	Condition				ll .		,		1
	13445				13445 part 4				
	part 2	!		<u> </u>	<u> </u>	l			L

Table VII - H Applicable Limits & Compliance Monitoring Requirements S-73 AND S-74, COOLING TOWERS March 1, 2017 - August 1, 2017

	Citation of	_	Future		Monitoring	Monitoring		Comp	liance
Type of Limit	Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type	Yes	No
Opacity	BAAQMD Regulation 6-1-301	Y		< Ringelmann 1 for more than 3 min/hr		N	None	Х	
Opacity	SIP Regulation 6-301	Y		> Ringelmann No. 1 for no more than 3 min/hr	None	N	N/A	Х	
Particulate Weight	BAAQMD Regulation 6-1-310	Y		0.15 grains per dscf		N	None	Х	
Particulate Weight	SIP Regulation 6-310	Y		0.15 grains per dscf		N	None	X	